

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

EDDIE GILL,

Plaintiff,

v.

v.

Case No. 15-CV-587

Circuit Court Case No. 15CV003600

CITY OF MILWAUKEE,
CHIEF EDWARD FLYNN,
DETECTIVES JAMES HENSLEY,
TIMOTHY GRAHAM,
MARK PETERSON,
ERIK GULBRANDSON,
BILLY BALL, and
DENNIS DEVALKENAERE

Defendants.

NOTICE OF REMOVAL OF DEFENDANT CITY OF MILWAUKEE

The defendant, City of Milwaukee, by Grant F. Langley, City Attorney, by Assistant City Attorney Jan A. Smokowicz and by Assistant City Attorney Jenny Yuan, pursuant to 28 U.S.C. §1446, hereby removes the above-captioned action from state court to this court, based upon the following grounds:

1. The above-captioned action was filed in the Circuit Court for Milwaukee County, State of Wisconsin, Milwaukee County Case No. 15-CV-003658, and is now pending in that court. Process, consisting of a summons and complaint, was served upon the defendant, City of Milwaukee, on April 28, 2015.

2. The action is a civil action which includes allegations against the City of Milwaukee of violations of the United States Constitution for which the plaintiff seeks redress under 42 U.S.C. §1983, and for which this Court has original jurisdiction under 28 U.S.C. §1331.

3. The defendants are entitled to remove the above-captioned action from the state court to this Court pursuant to 28 U.S.C. §1446(a).

4. Copies of all process and pleadings served upon the city is attached and filed herewith as Exhibit A.

5. That the Summons and Complaint for Milwaukee County Case No. 15-CV-003600 was served upon the City of Milwaukee on April 28, 2015, which is within 30 days of the makings of this petition.

Dated at Milwaukee, Wisconsin this 14th day of May, 2015.

GRANT F. LANGLEY
City Attorney

s/Jan A. Smokowicz
JAN A. SMOKOWICZ
Assistant City Attorney
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City of Milwaukee

s/Jenny Yuan
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EXHIBIT A